# Exhibit G

### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

SEVEN NETWORKS, LLC,	
Plaintiff, v. GOOGLE INC., Defendant.	CIVIL ACTION NO. 2:17-CV-442-JRG LEAD CASE  PATENT CASE  JURY TRIAL DEMANDED
v.  SAMSUNG ELECTRONICS AMERICA, INC. AND SAMSUNG ELECTRONICS Co., LTD.,  Defendants.	CIVIL ACTION No. 2:17-CV-441-JRG CONSOLIDATED CASE

# SEVEN NETWORKS' [PROPOSED] RULE 30(b)(6) DEPOSITION NOTICE TO GOOGLE RELATING TO VENUE

PLEASE TAKE NOTICE that Plaintiff Seven Networks, LLC by and through its attorneys of record, and pursuant to Federal Rules of Civil Procedure 30(b)(6) will take the oral deposition of Defendant Google LLC on [date] at [location] beginning at 9:00 am or at another mutually agreeable time and place as agreed upon by the parties. Pursuant to Rule 30(b)(6), Defendant is directed to designate one or more officers, directors, managing agents, or other persons to testify on its behalf and on behalf of its affiliated companies concerning the topics set out in Exhibit A, attached hereto. The deposition will be recorded by stenographic means. The deposition will be conducted before an officer authorized by law to administer oaths and will

continue from day-to-day (weekends and legal holidays excluded) until completed, or according to a schedule mutually agreed upon by the parties.

Dated: October 11, 2017

Respectfully submitted,

# /s/ Bruce S. Sostek

State Bar No. 18855700 Bruce.Sostek@tklaw.com

#### Max Ciccarelli

State Bar No. 00787242 Max.Ciccarelli@tklaw.com

#### Richard L. Wynne Jr.

State Bar No. 24003214 Richard.Wynne@tklaw.com

## Adrienne E. Dominguez

State Bar No. 00793630 Adrienne.Dominguez@tklaw.com

#### Vishal Patel

State Bar No. 24065885 Vishal.Patel@tklaw.com

#### Nadia Haghighatian

State Bar No. 24087652 Nadia.Haghighatian@tklaw.com

#### **Austin Teng**

State Bar No. 24093247 Austin.Teng@tklaw.com

#### Matt Cornelia

State Bar No. 24097534 Matt.Cornelia@tklaw.com

#### THOMPSON & KNIGHT LLP

One Arts Plaza 1722 Routh St., Suite 1500 Dallas, Texas 75201 214.969.1700 214.969.1751 (Fax)

**ATTORNEYS FOR PLAINTIFF** SEVEN NETWORKS, LLC.

#### Samuel F. Baxter

Texas State Bar No. 01938000 sbaxter@mckoolsmith.com

#### MCKOOL SMITH, P.C.

104 E. Houston Street, Suite 300 Marshall, Texas 75670 Telephone: (903) 923-9000 Facsimile: (903) 923-9099

## Theodore Stevenson, III

Texas State Bar No. 19196650 tstevenson@mckoolsmith.com

#### Eric S. Hansen

Texas State Bar No. 24062763 ehansen@mckoolsmith.com

#### MCKOOL SMITH, P.C.

300 Crescent Court, Suite 1500 Dallas, Texas 75201 Telephone: (214) 978-4000

Telecopier: (214) 978-4044

ATTORNEYS FOR PLAINTIFF SEVEN NETWORKS, LLC.

#### EXHIBIT A

- 1. Google's physical property owned, leased, rented, used, or otherwise possessed or controlled by Google located within the Eastern District of Texas, including but not limited to stores, warehouses, facilities or other space, inventory, equipment, servers, and other infrastructure relating to goods or services provided by Google, since December 13, 2011.
  - 2. Google's decision to place its Edge nodes in the Eastern District of Texas.
- 3. Google's agreements relating to physical property owned, leased, rented, used, or otherwise possessed or controlled by Google and located within the Eastern District of Texas since December 13, 2011.
- 4. Google's employees who have (a) worked in, (b) resided in, or (c) supported or worked on Google's physical equipment or software located in, the Eastern District of Texas since December 13, 2011.
- 5. Locations within the Eastern District of Texas where Google employees have conducted any amount of work since December 13, 2011.
- 6. The conditions of employment for Google's employees who have (a) worked in, (b) resided in, or (c) supported or worked on Google's physical equipment or software located in, the Eastern District of Texas since December 13, 2011.
- 7. Google's marketing, advertising, promotional materials, web pages, or directory listings identifying Google's presence within the Eastern District of Texas since December 13, 2011.
- 8. The nature, type, and amount of information present on each piece of Google equipment located within the Eastern District of Texas.

- 9. The nature, type, and amount of information sent from each piece of Google equipment located within the Eastern District of Texas to other computers located in the Eastern District of Texas.
- 10. The relationships between Google and companies located in the Eastern District of Texas, including but not limited to the nature and quantity of the services and data provided by Google, how Google provides such services and data, the employees involved in providing such services and data, and how such services and data are used in the Eastern District of Texas.